

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network Rationalization  
Service Changes, 2012

Docket No. N2012-1

DOUGLAS F. CARLSON  
INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS SUSAN M. LACHANCE (DFC/USPS-T13-1-7)

February 24, 2012

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Susan M. LaChance.

The instructions contained in my interrogatories to witness Whiteman (DFC/USPS-T13-1–9) are incorporated herein by reference.

Respectfully submitted,

Dated: February 24, 2012

DOUGLAS F. CARLSON

**DFC/USPS-T13-1.** Please describe the efforts that the Postal Service has made in the past 15 years to inform customers of the service standards that apply to individual pieces of First-Class Mail that they send or seek to send.

**DFC/USPS-T13-2.** Please explain, and provide documents that explain, the Postal Service's policies and practices, both current and at any time in the past 15 years, for encouraging, enticing, "upselling," or otherwise causing customers who appear at a retail service window to purchase Express Mail or Priority Mail for mail that they wish to send. This interrogatory specifically encompasses policies or practices that might cause the Postal Service not to inform customers of the correct and applicable service standard for First-Class Mail when the Postal Service offers Express Mail or Priority Mail to customers seeking to send mail.

**DFC/USPS-T13-3.** Please confirm that the Postal Service has had policies or practices in place in various retail channels, including Automated Postal Centers, retail windows, and *www.usps.gov*, for at least 15 years to encourage customers to use Express Mail or Priority Mail instead of First-Class Mail to send mail. If you do not confirm, please explain.

**DFC/USPS-T13-4.** Please identify all advertising campaigns and similar efforts that the Postal Service has undertaken in the past 15 years to encourage customers to use First-Class Mail or to inform customers of the service standards for First-Class Mail. Please provide documents and details.

**DFC/USPS-T13-5.** Please confirm that the customer-facing display connected to POS terminals in some post offices currently suggests, during at least certain periods of the day, that First-Class Mail that customers send will be delivered in one more day than the actual applicable service standard. If you do not confirm, please explain.

**DFC/USPS-T13-6.** Please confirm that election officials have expressed concerns to the Postal Service about the effect of changes in service standards

on timely delivery of mailed ballots in the November 2012 presidential election. If you do not confirm, please explain.

**DFC/USPS-T13-7.** If the Postal Service eliminates collection and processing of outgoing mail on Saturdays and eliminates overnight delivery standards for First-Class Mail, please confirm that voted ballots that customers deposit in a collection box after the final collection on Friday likely will not be delivered by Tuesday. If you do not confirm, please explain.